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December 20, 2005

Jack Broadbent
Executive Officer/APCO
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Re: San Francisco Electric Reliability Project
BAAQMD Application 12344
Errata for Final Determination of Compliance

Dear Mr. Broadbent:

Thank you for the opportunity to review the Final Determination of Compliance (FDOC) dated December 12, 2005, for the San Francisco Electric Reliability Project (SFERP). The FDOC did address the substantive issues in our letter dated August 24, 2005. However, there are a few editorial corrections noted below that should be made so that the engineering evaluation and permit conditions are consistent and accurate, and we are requesting that the District issue an errata addressing these items.

Editorial Corrections

Listed below are issues that we have identified in our review of the FDOC. We request that these issues be addressed as follows:

BACT for NOx (pages 10 & 11) – The discussion of best available control technology (BACT) on page 10 states that BACT for NOx is water injection and SCR; however, the conclusion on page 11 states that SFERP proposed the use of dry low NOx combustors and SCR with ammonia injection, which is incorrect. The second sentence in the conclusion should be corrected to say:

- "The applicant has proposed to comply with this emission limitation through the use of ~~dry low NOx combustors~~ water injection and SCR with ammonia injection."

Compliance with Regulation 2, Rule 7: Acid Rain (page 16) – This section indicates that SFERP must submit an Acid Rain Permit Application to the District at least 24 months prior to the date on which each unit commences operation. However, the implementing

permit condition (Condition 40) provides the alternative language that the turbines may be operated once a Title IV Operating Permit has been issued. For clarity, the discussion on page 16 should also include similar alternative language, such as adding a final sentence to read as follows:

- SFERP cannot operate either of the gas turbines until either
  - 1) a Title IV Operating Permit has been issued; or
  - 2) 24 months after the Title IV Operating Permit application has been submitted to the District, whichever is earlier.

Recordkeeping (Condition 25) – Conditions 18(c) and 18(d) state that compliance for CO mass emissions and concentration is to be based on a three-hour rolling average; however, there is no longer a computation of this average included in Condition 25. Condition 25 should be corrected as follows:

25. As specified below, the owner/operator shall calculate and record the following data:
    (a) Total Heat Input Rate for every clock hour and the average hourly Heat Input Rate.
    (b) On an hourly basis, the cumulative total Heat Input Rate for each calendar day for the following: each Gas Turbine and all three sources (S-1, S-2, and S-3).
    (c) The average NO_x mass emissions (as NO_2), ~~CO mass emissions,~~ and corrected NO_x ~~and CO~~ emission concentrations for every clock hour.
    (d) The average CO mass emissions and corrected CO emission concentrations for every rolling 3-hour period.
    (e) On an hourly basis, the cumulative total NO_x mass emissions (as NO_2) and the cumulative total CO mass emissions, for each calendar day for the following: each Gas Turbine (S-1, S-2, and S-3) combined.
    (f) For each calendar day, the average hourly Heat Input Rates, Corrected NO_x emission concentrations, NO_x mass emissions (as NO_2), corrected CO emission concentrations, and CO mass emissions for each Gas Turbine combined.
    (g) On a daily basis, the cumulative total NO_x mass emissions (as NO_2) and cumulative total CO mass emissions, for the previous consecutive twelve month period for all three sources (S-1, S-2, and S-3) combined.

(Basis: District Regulations 1-520.1, 9-9-501, BACT, Offsets, Cumulative Increase)

We appreciate the opportunity to review and comment on the FDOC. If you have any questions regarding these comments, or wish to discuss them further, please do not hesitate to call me or Gary Rubenstein of Sierra Research at (916) 444-6666.

Sincerely,

Nancy Matthews

/jr Gary Rubenstein

cc: Karen Kubick, SFPUC
Jeanne Sole, City of San Francisco
Jacqueline Minor, City of San Francisco
Steve DeYoung
Bill Pfanner, California Energy Commission
Tuan Ngo, California Energy Commission

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December 21, 2005

William Pfanner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: San Francisco Electric Reliability Project, Supplement A, 04-AFC-1

Dear Mr. Pfanner:

The Bay Area Air Quality Management District (BAAQMD) issued its final determination of compliance (FDOC) for the proposed San Francisco Electric Reliability Project (SFERP) on December 13, 2005. The Applicant has reviewed the FDOC and in a letter dated December 20, 2005, has requested that the BAAQMD issue errata to correct one inconsistency in the final permit conditions.

The purpose of this letter is to provide proposed revisions to the air quality-related condition of certification that corresponds to the correction we have requested of the BAAQMD. The proposed revisions to the condition of certification are included as Attachment A.

If you have any questions regarding this filing, please do not hesitate to call.

Sincerely,

Nancy Matthews

Nancy Matthews

attachments

cc: Karen Kubick, SFPUC
John Carrier, CH2M Hill
Steve DeYoung
Service List

Attachment A

Proposed Correction to Condition of Certification AQ-25

AQ-25. As specified below, the owner/operator shall calculate and record the following data:

(a) Total Heat Input Rate for every clock hour and the average hourly Heat Input Rate.

(b) On an hourly basis, the cumulative total Heat Input Rate for each calendar day for the following: each Gas Turbine and all three sources (S-1, S-2, and S-3).

(c) The average NOx mass emissions (as NO2), ~~CO mass emissions,~~ and corrected NOx ~~and CO~~ emission concentrations for every clock hour.

(d) The average CO mass emissions and corrected CO emission concentrations for every rolling 3-hour period.

(e) On an hourly basis, the cumulative total NOx mass emissions (as NO2) and the cumulative total CO mass emissions, for each calendar day for the following: each Gas Turbine (S-1, S-2, and S-3) combined.

(f) For each calendar day, the average hourly Heat Input Rates, Corrected NOx emission concentrations, NOx mass emissions (as NO2), corrected CO emission concentrations, and CO mass emissions for each Gas Turbine combined.

(g) On a daily basis, the cumulative total NOx mass emissions (as NO2) and cumulative total CO mass emissions, for the previous consecutive twelve month period for all three sources (S-1, S-2, and S-3) combined.

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December 21, 2005

William Pfanner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: San Francisco Electric Reliability Project, Supplement A, 04-AFC-1

Dear Mr. Pfanner:

In issuing its Final Determination of Compliance (FDOC) for the proposed San Francisco Electric Reliability Project (SFERP), the Bay Area Air Quality Management District (BAAQMD) determined that the Best Available Control Technology-based particulate emission limit for the combustion gas turbines proposed for the project should be 2.5 pounds per hour (lb/hr), rather than the 3.0 lb/hr emission limit proposed by the applicant. The FDOC issued by the BAAQMD contains this lower limit, which reduces total allowable hourly, daily, and annual $PM_{10}/PM_{2.5}$ emissions from the facility.

The purpose of this letter is to provide revised $PM_{10}/PM_{2.5}$ emissions calculations for the project that incorporate the new, lower emission limit. The revised calculations are provided in Attachment A. With this letter, we are also providing proposed revisions to the air quality-related conditions of certification that were included in the preliminary staff assessment to incorporate this and other changes made by the BAAQMD in the FDOC. The proposed revisions to the conditions of certification are included as Attachment B.

The applicant has not revised the ambient air quality modeling analysis to incorporate the new emissions limitations. Because the original modeling analysis used higher emission rates than those reflected in the final permit conditions, the original results conservatively overestimate the impacts of the proposed project.

If you have any questions regarding this filing, please do not hesitate to call.

Sincerely,

Nancy Matthews

Nancy Matthews

attachments

cc: Karen Kubick, SFPUC
John Carrier, CH2M Hill
Steve DeYoung
Service List

Appendix A
Revised Tables from the AFC

TABLE 8.1-17
Maximum Emission Rates—Each CTG

Pollutant	ppmv @ 15% O_2	lb/MMBtu	lb/hr
NO_x	2.5[a]	0.009	4.41
SO_2[b]	0.15	0.00092	0.45
CO	4.0[a]	0.0088	4.30
POC	2.0[a]	0.0025	1.23
PM_{10}	n/a	n/a	~~3.0~~ 2.5

Notes:

[a] NO_x, CO and POC emission rates exclude startups and shutdowns (see Table 8.1-18).

[b] Based on annual average natural gas sulfur content of 0.33 gr/100 scf.

TABLE 8.1-19
Maximum Emissions from New Equipment

Emissions/Equipment	NO_x	SO_2	CO	POC	PM_{10}
Maximum Hourly Emissions					
CTGs	120.0	1.3	30.0	6.0	~~9.0~~ 7.5
Cooling Towers	–	–	–	–	<0.1
Total, pounds per hour	**120.0**	**1.3**	**30.0**	**6.0**	**~~9.0~~ 7.5**
Maximum Daily Emissions					
CTGs	744.6	32.3	378.0	97.8	~~216.0~~ 180.0
Cooling Towers	–	–	–	–	0.9
Total, pounds per day	**744.6**	**32.3**	**378.0**	**97.8**	**~~216.9~~ 180.9**
Maximum Annual Emissions, tpy					
CTGs	39.8	2.7	27.9	7.7	~~18.0~~ 15.0
Cooling Towers	–	–	–	–	0.2
Total, tons per year	**39.8**	**2.7**	**27.9**	**7.7**	**~~18.2~~ 15.2**

TABLE 8.1-26
PSD Significant Emissions Levels

Pollutant	Facility Emissions (tpy)	PSD Threshold (tpy)	Significant?
NO_X	39.8	250	No
SO_2	2.7	250	No
POC	7.7	250	No
CO	27.9	250	No
PM_{10}[a]	~~18.2~~ 15.2	250	No

[a] PM_{10} emissions shown include cooling tower.

TABLE 8.1-30
Facility Best Available Control Technology Requirements

Pollutant	Applicability Level	Facility Emission Level (lbs/day)	BACT Required?
Criteria Pollutants: BAAQMD Regulation 2-2-301.1			
POC	10 lbs/day	97.8	yes
NPOC	10 lbs/day	–	no
NO_x	10 lbs/day	744.6	yes
SO_2	10 lbs/day	32.3	yes
PM_{10}	10 lbs/day	~~216.9~~ 180.9	yes
CO	10 lbs/day	378.0	yes
Noncriteria Pollutants: BAAQMD Regulation 2-2-301.2			
Lead	3.2 lbs/day	neg.	no
Asbestos	0.04 lbs/day	neg.	no
Beryllium	0.002 lbs/day	neg.	no
Mercury	0.5 lbs/day	neg.	no
Fluorides	16 lbs/day	neg.	no
Sulfuric Acid Mist	38 lbs/day	neg.	no
Hydrogen Sulfide	55 lbs/day	neg.	no
Total Reduced Sulfur	55 lbs/day	neg.	no
Reduced Sulfur Compounds	55 lbs/day	neg.	no

TABLE 8.1-31
BAAQMD Offset Requirements and Facility Emissions

Pollutant	Applicable Facility Size	Emission Increase	Facility Emissions	Regulation	Offsets Required
POC	10 tpy	Any increase	7.7 tpy	2-2-302	No
NO_x	10 tpy	Any increase	39.8 tpy	2-2-302	Yes
PM_{10}	100 tpy	1 tpy net increase	~~18.2~~ 15.2 tpy	2-2-303	No
SO_2	100 tpy	1 tpy net increase	2.7 tpy	2-2-303	No

TABLE 8.1-33
BAAQMD PSD Requirements Applicable to 100 tpy Fossil Fuel Fired Power Plants

Pollutant	PSD Facility Applicability Level	Modeling Threshold Level	Emissions from New Facility	Modeling Required	Applicable BAAQMD Regulation
NO_X	100 tpy	100 tpy	39.8 tpy	No	2-2-304.2
SO_2	100 tpy	100 tpy	2.7 tpy	No	2-2-304.2
PM_{10}[a]	100 tpy	100 tpy	~~18.2~~ 15.2 tpy	No	2-2-304.3
CO	100 tpy	100 tpy	27.9 tpy	No	2-2-305.1
POC	100 tpy	not required	7.7 tpy	--	--

[a] All particulate matter from the combustion turbines is assumed to be emitted as PM_{10}.

Table 8.1A-1
Emissions and Operating Parameters for New Turbines
San Francisco Electric Reliability Project
PM10 emission rate rev 12/05

	Case 1	Case 2	Case 3	Case 4	Case 5	Case 6
	36 deg full load, no chilling	59 deg full load, w/chilling	80 deg full load, w/chilling	36 deg 50% load	59 deg 50% load	80 deg 50% load
Ambient Temp, F	36	59	80	36	59	80
GT Load, %	100	100	100	50	50	50
GT heat input, MMBtu/hr (HHV)	484.6	487.3	487.2	273.8	274.0	272.2
Stack flow, lb/hr	1,128,201	1,107,509	1,107,154	745,437	768,865	787,074
Stack flow, dscfm	228,475	222,850	222,710	152,936	158,413	162,980
Stack flow, acfm	619,922	620,308	620,356	412,259	411,857	407,798
Stack temp, F	805	826	826	819	782	744
Stack exhaust, vol %						
O2 (dry)	14.66	14.47	14.46	15.64	15.82	16.00
CO2 (dry)	3.59	3.70	3.70	3.03	2.93	2.83
H2O	10.33	11.18	11.22	8.73	8.16	7.48
Emissions						
NOx, ppmvd @ 15% O2	2.50	2.50	2.50	2.50	2.50	2.50
NOx, lb/hr	4.39	4.41	4.41	2.48	2.48	2.47
NOx, lb/MMBtu	0.0091	0.0090	0.0091	0.0091	0.0091	0.0091
SO2, ppmvd @ 15% O2	0.182	0.182	0.182	0.182	0.182	0.182
SO2, lb/hr	0.45	0.45	0.45	0.25	0.25	0.25
SO2, lb/MMBtu	0.00092	0.00092	0.00092	0.00092	0.00092	0.00092
CO, ppmvd @ 15% O2	4.00	4.00	4.00	4.00	4.00	4.00
CO, lb/hr	4.28	4.30	4.30	2.42	2.42	2.40
CO, lb/MMBtu	0.0088	0.0088	0.0088	0.0088	0.0088	0.0088
VOC, ppmvd @ 15% O2	2.00	2.00	2.00	2.00	2.00	2.00
VOC, lb/hr	1.22	1.23	1.23	0.69	0.69	0.69
VOC, lb/MMBtu	0.0025	0.0025	0.0025	0.0025	0.0025	0.0025
PM10, lb/hr	***2.5***	***2.5***	***2.5***	***2.5***	***2.5***	***2.5***
PM10, lb/MMBtu	***0.0052***	***0.0051***	***0.0051***	***0.0091***	***0.0091***	***0.0092***
PM10, gr/dscf	***0.001275***	***0.001308***	***0.001308***	***0.001908***	***0.001842***	***0.001792***
NH3, ppmvd@15% O2	10.0	10.0	10.0	10.0	10.0	10.0
NH3, lb/hr	6.50	6.54	6.53	3.67	3.67	3.65

Table 8.1A-4
Detailed Calculations for Maximum Hourly, Daily and Annual Criteria Pollutant Emissions
San Francisco Electric Reliability Project
PM10 emission rate rev 12/05

	Base Load			Startup/Shutdown		NOx			SO2	CO			POC		PM10
	max. hour	hrs/day	hrs/yr	hrs/day	hrs/yr	Maximum lb/hr	Ann. Avg. lb/hr	Startup/Shutdown lb/hr (1)	lb/hr	Maximum lb/hr	Ann. Avg. lb/hr	Startup lb/hr	Maximum lb/hr	Startup lb/hr (1)	lb/hr
Each Turbine	1	20	3750	4	250	4.41	4.41	40.0	0.45	4.30	4.30	10.00	1.23	2.00	***2.5***

	NOx			SO2			CO			POC			PM10		
	Max lb/hr	Max lb/day	Total tpy	Max lb/hr	Max lb/day	Total tpy	Max lb/hr	Max lb/day	Total tpy	Max lb/hr	Max lb/day	Total tpy	Max lb/hr	Max lb/day	Total tpy
Turbine 1	40.0	248.2	13.3	0.45	10.8	0.9	10.0	126.0	9.3	2.0	32.6	2.6	2.5	60.0	***5.0***
Turbine 2	40.0	248.2	13.3	0.45	10.8	0.9	10.0	126.0	9.3	2.0	32.6	2.6	2.5	60.0	***5.0***
Turbine 3	40.0	248.2	13.3	0.45	10.8	0.9	10.0	126.0	9.3	2.0	32.6	2.6	2.5	60.0	***5.0***
Total, 3 Turbines	120.0	744.6	39.8	1.35	32.3	2.7	30.0	378.0	27.9	6.0	97.8	7.67	7.5	180.0	***15.0***
Cooling Tower	--	--	--	--	--	--	--	--	--	--	--	--	0.04	0.9	0.2
Facility Total	120.0	744.6	39.8	1.3	32.3	2.7	30.0	378.0	27.9	6.0	97.8	7.7	7.5	180.9	***15.2***

Appendix B
Proposed Revisions to PSA Conditions of Certification
Air Quality

AQ-SC11 The project owner shall provide additional ~~5~~ 4 TPY of PM2.5 emission reduction credits by subsidizing the replacement or modification (blocking chimneys) of wood stoves or fireplaces.

Verification: At least 30 days prior to the start of any site clearing or ground disturbance activities, the project owner shall provide the CPM, for approval, a final plan to acquire ~~5~~ 4 TPY of PM2.5 emission reduction credits. The wood stove and fireplace replacement or modification programs must start after the plan approval, and no later than 60 days prior to initial startup.

AQ-SC12 In lieu of compliance with Condition **AQ-SC11**, the project owner shall provide ~~45~~ 36 TPY of SOx emission reduction credits acquired in the local Hunters Point and/or Potrero areas to provide an annual equivalent of ~~15~~ 12 TPY of PM2.5.

Verification: The project owner shall submit to the CPM a list of ERCs to be surrendered to the District at least 60 days prior to initial startup.

AQ-18 The owner/operator of the Gas Turbine Combustors (S-1, S-2, and S-3) shall comply with requirements (a) through (h) below under all operating scenarios, except requirements (a) through (h) do not apply during a gas turbine start-up or shutdown.

(g) Sulfur dioxide (SO2) mass emissions at each P-1, P-2, and P-3 shall not exceed ~~0.0027~~ 0.0028 lb/MM Btu of natural gas fired. (Basis: BACT)

(h) Particulate matter (PM10) mass emissions at each P-1, P-2, and P-3 shall not exceed ~~3~~ 2.5 pounds per hour. (Basis: BACT)

AQ-19 The owner/operator shall not exceed the regulated air pollutant mass emission rates from each of the Gas Turbine Combustors (S-1, S-2, and S-3) during a start-up or a shutdown as established below. (Basis: BACT)

	~~Cold~~ Start-Up (lb/hour)	Shutdown (lb/hour)
Oxides of Nitrogen (as NO2)	40	40
Carbon Monoxide (CO)	10	10
Precursor Organic Compounds (as CH4)	2	2

AQ-20 The owner/operator of the Gas Turbines (S-1, S-2 and S-3) shall not ~~operate more than two startups and shutdowns per turbine in any one day~~ exceed the following daily limits for each turbine during any one calendar day. (Basis: Cumulative Increase)

	Daily Limits, lb/day
Oxides of Nitrogen (as NO_2)	283
Carbon Monoxide (CO)	132
Precursor Organic Compounds (as CH_4)	34
Particulate Matter	60
Sulfur Dioxide (SO_2)	33
Ammonia (NH_3)	156

AQ-21 The owner/operator shall ensure that the cumulative combined emissions from the Gas Turbine Combustors (S-1, S-2, and S-3) do not exceed the following limits during any consecutive twelve-month period, including emissions generated during gas turbine start-ups and shutdowns:

- 39.8 tons of NOx (as NO2) per rolling 365 day period;
- 27.9 tons of CO per rolling 365 day period;
- 7.7 tons of POC (as CH4) per rolling 365 day period;
- ~~18~~ 15 tons of PM10 per rolling 365 day period; and
- 2.7 tons of SO2 per rolling 365 day period.

AQ-25 As specified below, the owner/operator shall calculate and record the following data:

- total Heat Input Rate for every clock hour and the average hourly Heat Input Rate ~~for every rolling 3-hour period~~.
- on an hourly basis, the cumulative total Heat Input Rate for each calendar day for the following: each Gas Turbine and all three sources (S-1, S-2, and S-3).
- the average NOx mass emissions (as NO2), CO mass emissions, and corrected NOx and CO emission concentrations for every clock hour and for every rolling 3-hour period.
- on an hourly basis, the cumulative total NOx mass emissions (as NO2) and the cumulative total CO mass emissions, for each calendar day for the following: each Gas Turbine (S-1, S-2, and S-3) combined.
- For each calendar day, the average hourly Heat Input Rates, Corrected NOx emission concentrations, NOx mass emissions (as NO2), corrected CO emission concentrations, and CO mass emissions for each Gas Turbine combined.

- On a daily basis, the cumulative total NOx mass emissions (as NO2) and cumulative total CO mass emissions, for the previous consecutive twelve month period for all three sources (S-1, S-2, and S-3) combined.

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR THE SAN FRANCISCO ELECTRIC RELIABILITY PROJECT

Docket No. 04-AFC-01
PROOF OF SERVICE
Revised 8/03/05

DOCKET UNIT

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Also send a printed ***or*** *electronic copy of all documents to each of the following:*

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DECLARATION OF SERVICE

I, Evelyn M Johnson declare that on December 27, 2005, I deposited copies of the attached Letter from Sierra Research to Jack Broadbent, BAAQMD, re: BAAQMD Application 12344; Errata for Final Determination of Compliance for San Francisco Electric Reliability Project, in the United States mail at Sacramento, California with first class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. I declare under penalty of perjury that the foregoing is true and correct.

Evelyn M Johnson
[signature]

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